

June 26, 2015

Ms. Julie Saare-Edmonds
Department of Water Resources
1416 9th St.
Sacramento, CA 95814
Via email: Julie.saare-edmonds@water.ca.gov

Subject: Proposed Revisions to the Model Water Efficient Landscape Ordinance (MWELO)

Dear Ms. Edmonds:

Commenter

The California Alliance for Golf (CAG) is incorporated under the Laws of the State of California for the purpose of congealing the state's normative golf organizations/associations/businesses into one organization that can credibly purport to speak on behalf of the California golf industry in the public arena. Among the organizations comprising the Alliance are: Northern California Golf Association, Southern California Golf Association, Northern California PGA Section, Southern California PGA Section, California Golf Course Owners Association, California Golf Course Superintendents Association, Golden State Chapter Club Managers Association of America, and the Southern California Municipal Golf Association. The comments that follow are submitted on their behalf.

Comments

The Alliance's comments pertain to the following five (5) specific Sections of the Model Ordinance:

- Section 491. (iii) Definitions – Recreational Area;
- Section 492.7 (a) (1) (H) Irrigation Design Plan – Master Valves;
- Section 492.6 (a) (3) Landscape Design Plan – Soil Preparation, Mulch and Amendments
- Section 492.13 Irrigation Efficiency (IE); and
- Section 492.7 (V) Irrigation Design Plan – Precipitation Rate

Section 491. (iii) Definitions – Recreational Area

The language of the proposed revision defines as a “recreational area” those portions of a golf course that are “tees, fairways and greens.” The definition has specific application for many purposes of the MWELO, but the primary purpose is for defining those uses for which a 1.0 ETAF factor is appropriate. The intent is clear; only those areas of a golf course that are part of the “recreational” swath ought to be categorized so as to qualify for the 1.0 ETAF factor, while those areas that are not integral to the “recreational” purpose of the turf ought to be accorded lesser ETAF factors.

The problem with the language as proposed is that while “tees” and “greens” are terms of art with definite and easily discernible boundaries, “fairway” is not a term of art and is anything but definite and discernible; it expands or contracts based upon mowing height settings, with lower settings defining “fairway” and higher settings defining another non-term of art, “rough.” Both “fairway” and “rough” constitute the intended playing area of a golf course; indeed, both are integral to any golf course. As

such, they both merit inclusion as part of those areas of a golf course constituting a “recreational area” for the intended purposes of the “Special Landscape Area” designation.

“Surrounds,” a term that the golf industry uses to refer to those areas immediately adjacent to greens and bunkers, should also be included in any limiting definitional language.

This does not mean that ALL areas of a golf course should be included in the “recreational” definition. There are many areas of a golf course, e.g., areas of purely ornamental horticulture, areas of removed turf, areas of California friendly drought tolerant species, and areas not covered by irrigation systems that are not properly categorized as “recreational” for the purposes of ETAF factors and MAWA budgets/calculations.

Recommendation

That the definition in Section 491 (iii) be rewritten as follows:

“Recreational area” means areas, excluding private single family residential areas, dedicated to recreation or public assembly, such as parks, sports fields, picnic grounds, amphitheaters or golf course tees, fairways, roughs, surrounds and greens.

Section 492.7 (a) (1) (H) Irrigation Design Plan – Master Valves

While master valves perform a valuable function for the less sophisticated irrigation systems common to residences and non-turf businesses, they are counterproductive for golf courses. Golf courses use valve in head sprinklers where each individual sprinkler has a remote control valve built into it. This provides for individual control of each sprinkler while providing pressure regulation in each individual sprinkler. Greater flexibility and control are thus enabled as myriad combination of sprinklers can be deployed to achieve maximal control. Pipelines remain pressurized, which allows for golf courses to employ best practices regarding hand watering in lieu of turning on sprinklers. In addition, golf courses deploy pump stations that are equipped with a low pressure shut down feature that prevents operation in the event of a significant pipe failure.

Recommendation

That the following language be added to Section 492.7:

Special Landscapes that make use of technologies that allow for the individual control of sprinklers that are individually pressurized in a system equipped with low pressure shut down features are not required to employ master valves.

Section 492.6 (a) (3) Landscape Design Plan – Soil Preparation, Mulch and Amendments

Golf courses are increasingly removing turf in out-of-play areas and replacing them with California friendly drought tolerant plantings and various other “native” landscapes. These out-of-play areas are “out-of-play” for purposes of “recreational” definition and standard turf irrigation, but they are often very much in-play for the vast majority of golfers whose skill levels are at best mediocre. If such ground is covered in 3 inches of organic mulch golf balls will be difficult to find, and in both their searches and

their shot execution golfers are going to destroy the mulch covering, requiring removal at a subsequent date or continual refurbishment of the mulch area. To the extent to which it is the goal of public policy to promote the removal of turf and its replacement by species that require no irrigation subsequent to a grow-in period, a mulch requirement for golf courses would accomplish its opposite. To the extent to which it is important to avoid the environmental problems associated with mulch clogging storm drains and contaminating waterways, a mulch requirement for golf courses would prove problematic.

Recommendation

Eliminate a blanket requirement of mulch in all non-turf areas of landscapes surrounding golf courses.

Section 492.13 Irrigation Efficiency (IE)

While the draft MWELD can be read such that the proposed changes to the Irrigation Efficiency (IE) factors are not relevant to the golf industry due to the 1.0 ETAF applied to "Special Landscape Areas," we are compelled to express concern whenever we discern a move in the direction of an IE factor unhinged from reality.

Recommendation

Use changes in the Plant Factor component of ETAF as way to promote the use of plants requiring less water

Section 492.7 (V) Irrigation Design Plan – Precipitation Rate

One of the tools the California golf industry has employed in a 15-year sustained effort to reduce its water footprint involves the investment of substantial resources into irrigation equipment and technologies focused on maximal irrigation efficiency. Runoff is the bane of that effort; penetration its best friend.

DWR's proposal to limit the maximum Precipitation Rate to 1.0 inch per hour along with the retention of a 0.75 inch per hour limitation on slopes obviates the utility of that equipment and those technologies and would require the installation of less efficient equipment on new constructions and reconstructions.

Sprinkler systems are designed as trade-offs between Precipitation Rate, losses due to wind drift and evaporation, distribution uniformity, and soil moisture uniformity. Third party independent research (Arizona University, Florida University, and Cal Poly Pomona) demonstrates that lower Precipitation Rates have wind drift and evaporation losses 15-20% greater than higher Precipitation Rate devices in 5 MPH winds, which is the common average wind speed in California.

Because the golf industry makes routine use of Smart Controllers that automatically limit cycle time, it is able to avail itself of the larger, more penetrating droplets that higher precipitation rate technologies provide while at the same time avoiding the runoff that is the bane of the industry's effort to reduce its water footprint and the clear intent of DWR's promulgation of this 1.0 standard. In addition, because the golf industry also makes routine use of sprinklers that can be controlled in a manner that permits ½ distribution in each individual head, it is able to make efficient use of a focused water application that by

definition of its maximally focused distribution situs carries a Precipitation Rate far in excess of 1.0 inch per hour.

The obviation of these capacities would yield a California golf industry that is less efficient than would be the case were limits on Precipitation Rate to be eliminated for those irrigation systems that contain Smart Controllers capable of limiting cycle time so as to apply the amount of water needed and avoid all possibility of runoff.

Recommendation

Eliminate Precipitation Rate limits on systems that contain Smart Controllers capable of limiting cycle time and applying the desired amount of water without possibility of runoff.

Addendum Comment

Section 490.1 (a) (1) of the draft applies the Ordinance to any “rehabilitated landscape” over 2,500 square feet. However, the definition of “rehabilitated landscape” under Section 491 (eee) applies only to those rehabilitated landscapes in excess of 2,500 square feet AND constituting greater than 50% of the total landscape area.

The 491. (eee) qualifying language works well for Large Special Landscapes such as golf courses, parks and sports fields; however, to the extent that DWR has indicated that it is considering the excision of that 50% of “total landscape area” qualifier, separate language for Large Recreational Landscapes would need to be developed that could account for the fact that the simplest of projects would ALWAYS rise to the level of a major rehabilitation without making such separate provision. This strikes us as contrary to the DWR’s intent re Special Landscapes.

Recommendation

That the language in Section 491. (eee) be retained for Large Landscapes and the same language be incorporated into Section 490.1 (a) (1); with both restricted to the “Recreational Areas” enumerated in Section 491. (iii).

Conclusion

On behalf of the California Alliance for Golf (CAG), its various constituent organizations, and the California golf industry I want to thank DWR for entertaining the comments contained herein as well as for engaging some of our key stakeholders in a conference call earlier this week. We very much appreciate the offer to continue the dialog as MWELO and other matters of common cause arise.

If you have any clarifying questions about these comments please feel free to contact me at csthomas@pgahq.com or (707) 449-4742 or Southern California Golf Association Director of Governmental Affairs Craig Kessler at ckessler@scga.org or (310) 941-4803.

Respectfully Submitted,

Chris Thomas
President California Alliance for Golf